| 1 2 3 4 | JAMES A. ORONOZ, ESQ. Nevada Bar No. 6769 ORONOZ & ERICSSON, LLC 1050 Indigo Drive, Suite 120 Las Vegas, Nevada 89145 Telephone: (702) 878-2889 Facsimile: (702) 522-1542 jim@oronozlawyers.com | |
|-------------------------------|---|--|
| 56 | Attorney for Tiffany Henderson | |
| 7 8 | UNITED STATES DISTRICT COURT | |
| 9 | DISTRICT OF NEVADA | |
| 10 | |) |
| 11 | UNITED STATES OF AMERICA, |))) CASE NO: 2:18-cr-356-APG-DJA-2 |
| 12 | Plaintiff, |) STIPULATION AND ORDER TO |
| 13 | VS. |) CONTINUE SENTENCING) (First Passage) |
| 14 | TIFFANY TIARRA HENDERSON, |) (First Request)) |
| 15 16 | Defendant. |))) |
| 17 | |)) |
| 18 | |) |
| 19 | IT IS HEREBY STIPULATED AND AGREED by Tiffany Henderson, by and | |
| 20 | through her attorney, JAMES A. ORONOZ, ESQ., and the United States of America, by and | |
| 21 | through PETER S. LEVITT, ESQ., Assistant United States Attorney, that the sentencing | |
| 22 | hearing currently scheduled for September 19, 2019, at 10:00 a.m., be vacated and continued | |
| 23 | at least sixty (60) days past the current sentencing date to a date and time that is convenient | |
| 24 | to this Honorable Court. | |
| 25 | The request for a continuance is based upon the following: | |
| 26 27 | prepare the Presentence Investig | Michelle Cravotta requires additional time to ation Report. Defendant Henderson resides out ation requires additional time to complete the |

investigation and the report.

| 1 | 2. | Defendant Tiffany Henderson is not in custody, and she has no objection to the continuance. | |
|-----|--|---|--|
| 2 3 | 3. | 3. Defense Counsel has spoken with United States Probation Officer Michelle Cravotta, and she agrees to the continuance. | |
| 4 | 4. Defense Counsel for has spoken to AUSA Peter Levitt, and he agrees to the | | |
| 5 | | continuance. | |
| 6 | 5. | The additional time requested herein is not sought for purposes of delay. | |
| 7 | 6. The additional time requested by this Stipulation to Continue Sentencing is | | |
| 8 | | reasonable pursuant to Fed.R.Crim.P. 32(b)(2), which states that the "court may, for good cause, change any time limits prescribed by this rule." | |
| 9 | 7 | | |
| 10 | 7. | Additionally, denial of this request for continuance could result in a miscarriage of justice. | |
| 11 | | | |
| 12 | DATED: August 12, 2019 | | |
| 13 | Respectfully submitted, | | |
| 14 | | | |
| 15 | /s/ James A. C | | |
| 16 | James A. Oros Oronoz & Eric | • | |
| 17 | | Orive, Suite 120 501 Las Vegas Boulevard, South, Suite 1100 | |
| 18 | Las Vegas, No | <u> </u> | |
| 19 | Attorney for Tiffany Henderson Attorney for the United States of America | | |
| | | | |
| 20 | ORDER | | |
| 21 | IT IS HEREBY ORDERED that the Sentencing Hearing currently scheduled for | | |
| 22 | September 19, 2019, at 10:00 A.M., be continued to December 12, 2019, at 9:30 A.M., in courtroom 6C. | | |
| 23 | | | |
| 24 | | | |
| 25 | UNITED STATES DISTRICT JUDGE | | |
| 26 | | | |
| 27 | DATED this 12th day of August , 2019. | | |
| 28 | | | |